

The Honorable Robert S. Lasnik

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Of counsel:  
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U.S. Attorney, Western District of  
Washington

*Counsel for the United States of America*

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

TYLER CARR, an individual,  
  
Plaintiff,

v.

TAYLOR NOREN, an individual, WELLS  
FARGO BANK, N.A. AS TRUSTEE FOR  
HARBORVIEW MORTGAGE LOAN  
TRUST 2006-10, a Delaware corporation,  
GREENPOINT MORTGAGE FUNDING,  
INC., a New York corporation, and the  
INTERNAL REVENUE SERVICE, a federal  
agency,

Defendants.

NO. 2:22-CV-115-RSL

DECLARATION OF M. BLAIR HLINKA  
RE: VERIFICATION OF STATE  
COURT RECORDS

1 I, M. Blair Hlinka, pursuant to 28 U.S.C. § 1746, declare as follows:

2 1. I am employed as a Trial Attorney with the United States Department of Justice,  
3 Tax Division, in Washington, D.C. I am assigned the responsibility of representing the federal  
4 defendant in the above-captioned case.

5 2. On February 2, 2022, the federal defendant removed this action to this Court. Dkt.  
6 # 1.

7 3. Pursuant to Local Rule W.D. 101(b), to the best of my knowledge and belief, the  
8 documents filed as Exhibit 1 to 5 to this declaration, together with Dkt. # 1-1 and #1-2, constitute  
9 a full and complete set of documents filed with the Clerk of King County Superior Court during  
10 the pendency of the King County lawsuit, 21-2-16794-9-SEA.

11 4. Exhibit 1 is the amended complaint filed by Plaintiff Tyler Carr and received by  
12 undersigned counsel on February 2, 2022.

13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed on this 9th day of February, 2022.

15 s/ M. Blair Hlinka  
16 M. BLAIR HLINKA  
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24 *Counsel for the United States of America*  
25  
26

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of February, 2022, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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Counsel for Defendant Greenpoint Mortgage Funding, Inc.

I also hereby certify that on this 9th day of February, 2022, I caused such filing to be mailed through USPS to the following:

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Defendant

s/ M. Blair Hlinka  
M. BLAIR HLINKA  
Trial Attorney  
United States Department of Justice, Tax Division